

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

**GEORGE LOGUE,**

**Plaintiff,**

**v.**

**EXPERIAN INFORMATION  
SOLUTIONS, INC.,**

**Defendant.**

**Case No.: 04-11779-RCL**

**PROPOSED PRE-TRIAL SCHEDULE**

Pursuant to the Federal Rules of Civil Procedure 16 and 26, Local Rule 16.1, Defendant Experian Information Solutions, Inc., ("Experian") submits its proposed pre-trial schedule. Defense counsel has not been able to reach the Plaintiff to discuss the proposed agenda and proposed discovery schedule. Plaintiff contacted the undersigned last week to discuss the case.

At that time, the undersigned referred Plaintiff to Attorney Christine Jennings, and provided the telephone number for same. The undersigned also obtained Plaintiff's telephone number and provided it to Attorney Jennings. Neither the undersigned, nor Attorney Jennings have been able to contact the Plaintiff as of this date, despite efforts to do so.

**I. AGENDA FOR INITIAL SCHEDULING CONFERENCE**

Defendant proposes that the agenda for the initial scheduling conference include the following:

1. Defendant's proposed discovery plan;

2. A discussion and explanation of plaintiff's claims; and
3. Plaintiff's settlement demand (Plaintiff has not yet submitted a settlement demand).

## II. DISCOVERY PLAN

### A. Initial Disclosures

All the information required by Fed. R. Civ. P. 26(a)(1) will be exchanged on or before January 30, 2005.

### B. Written Discovery Requests

Written discovery requests to a party may be served at any time after the scheduling conference. All written discovery requests must be served no later than March 1, 2005.

### C. Depositions

The parties propose that they may notice and take depositions at any time after the scheduling conference and up to August 31, 2005.

### D. Expert Disclosure and Discovery

The parties propose that experts must be designated and reports filed by April 1, 2005. Expert depositions shall be completed by September 30, 2005.

## III. FILING OF MOTIONS

The parties propose that motions for summary judgment be filed no later than November 30, 2005.

## IV. PROPOSED CONFERENCES WITH COURT AND FINAL PRE-TRIAL CONFERENCE

The Defendant proposes that the Court schedule a final Pretrial Conference within 45 days of receipt of a decision of any pending dispositive motions, if dispositive motions are filed. Otherwise, the Defendant proposes that the final Pretrial Conference be scheduled as soon as practicable after the close of discovery.

V. TRIAL BY MAGISTRATE JUDGE

Defendant does not consent to a trial before a magistrate judge.

Dated: Worcester, MA  
January 5, 2005

EXPERIAN INFORMATION SOLUTIONS, INC.

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-and-

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**CERTIFICATE OF SERVICE**

This is to certify that a copy of the foregoing was mailed, first-class mail, postage prepaid, on this 5th day of January, 2005, to:

George Logue  
General Delivery  
Boston, Massachusetts 02205  
*Plaintiff Pro Se*

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Robert S. White